

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re  
City of Detroit,  
Debtor

Chapter 9  
Case No. 13-53846  
Hon.: Steven W. Rhodes

**CREDITOR'S REQUEST FOR RESPONSES TO INTERROGATORIES,  
PRODUCTIONS OF DOCUMENTS AND FOR ADMISSIONS**

NOW COMES, the Creditor Dennis Taubitz and submits the following discovery requests to the Debtor:

**DEFINITIONS**

1. The term "Debtor" means and includes the City of Detroit, its employees, agents, representatives and attorneys.
2. The term "Creditor" or any synonym thereof is intended to and shall embrace and include in addition to said Creditor, all agents, servants, and employees, representatives, insurers, sureties, indemnitors, contractors, subcontractors or others who are in possession of or who may have obtained information for or on behalf of Creditor, or who may have acted on behalf of or at the direction of the Creditor.
3. The term "Document" includes any written, printed, typed or other graphic or photographic matter of any nature, kind or character, or any audio, letters, correspondence, memoranda, notes, films, contracts, agreements, books, working papers, desk calendars, tapes, drawings, surveys, graphs, charts, phone records, compilations from which any information can be obtained, including but not limited to computer data files, in the Debtor's possession, custody, or control, or known by Debtor to exist or have existed, including all drafts.
4. "Person" includes any individual, corporation, partnership, group, association, governmental entity, or any other organization.
5. When identification of any person is requested herein, give his or her (i) name; (ii) current address; (iii) current telephone number; (iv) employer and (v) job title.

6. When identification of any document, correspondence, order or other writing is requested, give (i) its date; (ii) the author or addressor; (iii) the addressee, (iv) the identity of the persons presently in custody , control or possession thereof and (vii) state whether you will produce it upon request without the necessity of a Court Order.
7. The term “describe in detail” as used herein means: (a) describe fully by reference to underlying facts rather than by reference to ultimate facts or conclusions of fact or law; (b) where applicable, particularize as to time, place and manner; (c) set forth all relevant facts necessary for the complete understanding of the act, process, event or thing in question.
8. As used herein, the singular form of a noun or pronoun shall be considered to include within its meaning, the plural form of the noun or pronoun so used and vice versa; the use of the masculine form of a pronoun or noun shall be considered to include within its meaning, the feminine form of the noun or pronoun so used and vice versa; and the use of any tense of any verb shall be considered to include also within all other tenses of the verb so used.
9. The term “employee” is intended to include in addition to individuals employed by the Debtor any and all agents, servants, assigns, subcontractors and independent contractors.
10. The term “retiree” is intended to include in addition to individuals previously employed by the Debtor, any and all agents, servants, assigns, subcontractors, and independent contractors.

### **INTERROGATORY**

1. Identify the person or persons answering these discovery requests.

**ANSWER:**

2. Identify each person who provided information, or who assisted in any way in furnishing all or part of the answers to these discovery requests. If such person provided information or assisted with regard to fewer than all of the answers to these discovery requests, identify the particular answers for which each such person provided information or assistance. State separately for each discovery requests for which the person provided information, whether the information provided was based on personal knowledge; and if based on personal knowledge, state the specific sources of the information in detail.

**ANSWER:**

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## REQUEST TO ADMIT

1. Admit that the Debtor is solvent.

~~If the Debtor does not admit to the foregoing, Admission, kindly, answer the following Interrogatory and Request for Production of Documents.~~

Interrogatory: Name any and all witnesses and provide their addresses and telephone numbers that will support your denial of the aforementioned admission.

Request for Production of Documents: Provide any and all documents that would support the Debtor's denial of the aforementioned admission.

**ANSWER:**

2. Admit that the Debtor has assets consisting of personal property.

If the Debtor does not admit to the foregoing, Admission, kindly, answer the following Interrogatory and Request for Production of Documents.

Interrogatory: Name any and all witnesses and provide their addresses and telephone numbers that will support your denial of the aforementioned admission.

Request for Production of Documents: Provide any and all documents that would support the Debtor's denial of the aforementioned admission.

**ANSWER:**

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3. Admit that the Debtor has assets consisting to real property.

If the Debtor does not admit to the foregoing, Admission, kindly, answer the following Interrogatory and Request for Production of Documents.

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Interrogatory: Name any and all witnesses and provide their addresses and telephone numbers that will support your denial of the aforementioned admission.

Request for Production of Documents: Provide any and all documents that would support the Debtor's denial of the aforementioned admission.

**ANSWER:**

#### **REQUEST TO ADMIT**

4. Admit that the Debtor has failed to sell any assets.

**ANSWER:**

5. Admit that the Debtor has Accounts Receivable

**ANSWER:**

6. Admit that the Debtor has failed to collect on its accounts receivables.

**ANSWER:**

7. Admit that Debtor's conduct resulted in a denial of due process to the creditors.

**ANSWER:**

8. Admit that the Debtor has paid some creditor within the ninety (90) day period preceding the filing of the Debtor's bankruptcy case.

**ANSWER:**

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9. Admit that the Debtor's Motions filed in the bankruptcy court resulted in a denial of due process to some of the creditors.

**ANSWER:**

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10. Admit that the Debtor intended a denial of due process to some creditors, particularly retirees.

**ANSWER:**

11. Admit that the Debtor never negotiated in good faith with the creditor Dennis Taubitz.

**ANSWER:**

12. Admit that the Debtor never negotiated in good faith with the creditor Peter Guzman.

**ANSWER:**

13. Admit that the Debtor never negotiated in good faith with the creditor Michael Karwoski.

**ANSWER:**

14. Admit that the Debtor never negotiated in good faith with creditor Beverly Welch.

**ANSWER:**

15. Admit that the Debtor never negotiated in good faith with the creditor Irma Industrious.

**ANSWER:**

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16. Admit that the Debtor never negotiated in good faith with any creditor.

**ANSWER:**

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17. Admit that the retirees are not represented by a labor union.

**ANSWER:**

18. Admit that the Debtor never negotiated in good faith with the labor union that represents City of Detroit employees.

**ANSWER:**

19. Admit that the Debtor failed to negotiate in good faith with any retiree creditor.

**ANSWER:**

20. Admit that the Debtor failed to negotiate in good faith with any City employee creditor.

**ANSWER:**

21. Admit that the Debtor failed to negotiate with creditor Dennis Taubitz.

**ANSWER:**

22. Admit that the Debtor failed to negotiate with any retiree creditor.

**ANSWER:**

23. Admit that the Debtor never communicated directly with creditor Dennis Taubitz prior to filing for bankruptcy.

**ANSWER:**

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24. Admit that Debtor never communicated with any retiree creditor prior to filing for bankruptcy.

**ANSWER:**

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25. Admit that Debtor failed to communicate its intentions to file bankruptcy with its own Law Department prior to July 18, 2013.

**ANSWER:**

### **REQUEST FOR PRODUCTION OF DOCUMENTS**

26. Produce any document not already produced in answer to the prior discovery requests that support the Debtor's claim that it is entitled and/or authorized to file for Chapter 9 Bankruptcy.

**ANSWER:**

### **INTERROGATORIES**

27. Provide the dollar amount owed and uncollected regarding the City of Detroit income tax prior to July 18, 2013.

**ANSWER:**

28. Provide a detailed listing of all collection efforts, including lawsuits filed to collect the delinquent City of Detroit income tax accounts described in Interrogatory Number 27.

**ANSWER:**

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29. Provide a dollar amount collected for all collection efforts described in response to Interrogatory Number 28.

**ANSWER:**

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30. Provide the name addresses and telephone numbers of the person in charge of the collection of the City of Detroit income tax accounts.

**ANSWER:**

31. Provide a dollar amount owed and uncollected as a result of delinquent City of Detroit parking tickets.

**ANSWER:**

32. Provide a detail listing of all collection efforts, including lawsuits filed to collect the delinquent City of Detroit parking tickets.

**ANSWER:**

33. Provide the dollar amount collected for all collection efforts regarding delinquent City of Detroit parking tickets.

**ANSWER:**

34. Provide name addresses and telephone numbers of the person in charge of the collection of Detroit parking tickets.

**ANSWER:**

35. Provide the dollar amount owed to the Debtor as a result of delinquent real property taxes prior to July 18, 2013.

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**ANSWER:**

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36. Provide a detailed listing of all collection efforts, including lawsuits filed to collect the delinquent City of Detroit real property taxes.

**ANSWER:**

37. Provide a dollar amount collected for all collection efforts regarding City of Detroit real property taxes.

**ANSWER:**

38. Provide the name, address, telephone number, and E-mail address of the person in charge of the collection of the City of Detroit real property taxes.

**ANSWER:**

39. Provide the dollar amount owed to the Debtor regarding delinquent City of Detroit personal property taxes.

**ANSWER:**

40. Provide a detailed listing of all collection efforts, including lawsuits filed to collect the delinquent City of Detroit personal property taxes.

**ANSWER:**

41. Provide a dollar amount collected for all collection efforts described regarding the City of Detroit personal property taxes.

**ANSWER:**

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42. Provide the name, address, telephone number, and E-mail address of the person in charge of the collection of City of Detroit personal property taxes.

**ANSWER:**

43. Provide the dollar amount owed to the debtor of any other delinquent account receivable prior to July 18, 2013.

**ANSWER:**

44. Provide a detailed listing of all collection efforts, including lawsuits filed to collect City of Detroit account receivables.

**ANSWER:**

45. Provide a dollar amount collected for all collection efforts regarding City of Detroit account receivables.

**ANSWER:**

46. Provide the name, address, telephone number and E-mail address of the person in charge of the collection of the City of Detroit account receivables.

**ANSWER:**

47. Provide the name, address, telephone number and E-mail address of any individual that the Debtor claims negotiated with creditors.

**ANSWER:**

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48. Provide the name, job title, address (both work and home), telephone number and E-mail address of all individuals that the Debtor claims negotiated with retiree creditor Peter Guzman.

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**ANSWER:**

49. Provide the name, job title, address (both work and home), telephone number and E-mail address of all individuals that the Debtor claims negotiated with retiree creditor Dennis Taubitz.

**ANSWER:**

50. Provide the name, job title, address (both work and home), telephone number and E-mail address of all individuals that the Debtor claims negotiated with creditor Irma Industrious.

**ANSWER:**

51. Provide the name, job title, address (both work and home), telephone number and E-mail address of all individuals that the Debtor claims negotiated with creditor Michael Karwoski.

**ANSWER:**

52. Provide the date, location and time of all the alleged negotiations that the Debtor claims occurred with creditor Dennis Taubitz.

**ANSWER:**

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53. Provide the date, location and time of all the alleged negotiations that the Debtor claims occurred with creditor Irma Industrious.

**ANSWER:**

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54. Provide the date, location and time of all the alleged negotiations that the Debtor claims occurred with creditor Michael Karwoski.

**ANSWER:**

55. Provide the date, location and time of all the alleged negotiations that the Debtor claims occurred with creditor Paul Guzman.

**ANSWER:**

56. Provide the date, location and time of all the alleged negotiations that the Debtor claims occurred with all the creditors.

**ANSWER:**

57. Describe in detail why the alleged notice described in Interrogatory Number 52 constitutes negotiation in good faith.

**ANSWER:**

58. Describe in detail why the alleged notice described in Interrogatory Number 53 constitutes negotiation in good faith.

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**ANSWER:**

59. Describe in detail why the alleged notice described in Interrogatory Number 54 constitutes negotiation in good faith.

**ANSWER:**

60. Describe in detail why the alleged notice described in Interrogatory Number 55 constitutes negotiation in good faith.

**ANSWER:**

61. Describe in detail why the alleged notice described in Interrogatory Number 56 constitutes negotiation in good faith.

**ANSWER:**

This discovery request is to be regarded as continuing and you are requested to provide by way of supplementary answers, such additional information, documents or things as may later be obtained by you or on your behalf, or which may later come into existence. If the space allotted for the answer to any individual discovery request is insufficient, please attach another sheet properly identifying the number of the discovery request being answered.

Respectfully submitted,



Dennis Taubitz  
Creditor  
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Detroit, MI 48224  
(313) 6329150

Dated

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